

Sacramento Regional County Sanitation District  
Sacramento Regional Wastewater Treatment Plant  
Tentative NPDES Permit Renewal and Time Schedule Order

Commenter:	Cliff Dahm	
Comment No.	Topic (i.e., ammonia, Title 22 tertiary, dilution, etc.)	Summarized Comment
1	Interim actions to reduce total ammonia discharge	The permit should contain a more explicit requirement to identify and implement operational changes to minimize total ammonia discharge in the period between the time the permit is adopted and the time that the proposed ammonia discharge limits take effect. The monitoring record shows considerable variation in the amount of ammonia discharged, which suggests that there may be opportunities to reduce ammonia discharge through changed plant operations. This analysis of interim opportunities should include a schedule and reporting requirements.
2	Ammonia monitoring	Associated with comment No. 1, the permittee should be required to conduct continuous total ammonia monitoring of the SRWTP effluent. The technology for continuous total ammonia monitoring at the range of existing effluent concentrations is readily available and relatively inexpensive. This will enable the permittee to analyze the effects of process changes on total ammonia concentrations in the effluent.
3	Permitting options	I support the tentative NPDES permit alternative for ammonia removal (i.e., full nitrification) listed in the "Tentative Permit Alternatives" document.